

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TURQUOISE HILL RESOURCES LTD.
SECURITIES LITIGATION

Case No. 1:20-cv-08585-LJL

**ORDER GRANTING MOTION FOR ISSUANCE OF LETTERS OF REQUEST
PURSUANT TO THE HAGUE CONVENTION ON THE TAKING OF EVIDENCE
ABROAD IN CIVIL OR COMMERCIAL MATTERS DATED MARCH 18, 1970**

The Court, having reviewed Lead Plaintiff's Motion for Issuance of Letters of Request Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters Dated March 18, 1970, as well as papers in support, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Requests for Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as Exhibits A and B to the Declaration of Michael D. Blatchley, dated March 2, 2023, are hereby issued as the Court's "Letters of Request" and are fully incorporated herein.
3. The signed Order and the Letters of Request will be given to Bernstein Litowitz Berger & Grossmann LLP, who will cause both documents to be filed with The Senior Master, For the attention of the Foreign Process Section, Room E16, Royal Courts of Justice, Strand, London WC2A 2LL, England.
4. The Protective Order in this action will apply to the witnesses' depositions, including the transcripts and the video, and the witnesses may produce documents designated as confidential in accordance with the Protective Order.

5. This Order, the witnesses' production of documents, the witnesses' depositions, or the terms of the Letters of Request (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the United Kingdom, the United States of America, or the State of New York.

IT IS SO ORDERED
DATED: 3/8/2023



THE HONORABLE LEWIS J. LIMAN
UNITED STATES DISTRICT JUDGE